

1905-037 Chancery Causes: Lula King vs. Jerry King
Lee Co

Williams, Miles

CA-Divorce
T-Vices

To the Honorable H. A. W. Skeen, Judge of the circuit court of
Lee County, Virginia:

Humbly complaining, your oratrix, Lula King, respectfully represents unto your honor that on the 30th day of May, 1902, she was united in matrimony to one Jerry King; that both she and her said husband are now and have been since their said marriage residents ^{and domiciled in} of Lee county, Virginia; ^{that they last cohabited together in said County} that shortly after their said marriage the said Jerry abandoned and deserted her, and has never really lived with and supported her, although she has borne him two children, the eldest of which is dead and the younger of which is now only a few months old; that the said Jerry has recently become enamored of one Mat Williams, a woman of bad repute, and within the last three or four months has been guilty of repeated acts of adultery with the said Mat Williams in Lee County, Virginia, on the town branch, north of the town of Jonesville; that he has been seen to go with the said Mat Williams out into the bushes and there remain with her for some hours by numerous persons; that since she has been informed of these acts of adultery on his part, she has not cohabited with the said Jerry; that she is unable to state the exact times of there acts of adultery, but can and does state that they have occurred repeatedly within the months of February and March, 1905. The said Jerry has no property of any worth or value, and hence she does not seek or ask alimony.

In consideration whereof, your oratrix prays that the said Jerry King be made a party defendant to this bill, and be required to answer the same; that spa. issue; and that upon a hearing she be granted an absolute divorce from the said Jerry.

L. I. Nyatt, p.g.

Lula King
✓ { In Chancery.
Jerry King

Bill for Divorce.

Filed Apr. 19th 1905.

J. C. Ewing, Clerk.
By W. E. Hancay, D.C.
1905. 1st May Rules

Bill filed Sp. 14.
scutid

" 2nd May Rules
Cause set for hear-
ing.

Costs:
Clerk \$3.30
Shff. 1.60
Atty. 15.00
Jury 1.50
Com. .75
Wit. .50
\$22.65

L. T. HYATT
ATTORNEY AT LAW
JONESVILLE, VIRGINIA

1900 to 10

Lula King Plaintiff
vs { In Chancery.
Jerry King Defendant.

This cause came on this the 16th day of May, 1905, to be heard upon the bill of the plaintiff, personal service of process on the defendant, the cause regularly matured at rules and set for hearing by the plaintiff, and the depositions of witnesses; and was argued by counsel. On consideration of all which the court is of opinion that the said evidence sustains the allegations of the bill, and it is therefore adjudged, ordered and decreed that the bonds of matrimony existing between the plaintiff and defendant be and the same are hereby dissolved, and the parties absolutely divorced from each other. It is further adjudged, ordered and decreed that the plaintiff recover from the defendant the costs of this suit, for which execution may issue.

And the cause is stricken from the docket.

Lula King
vs { Lu Chauncery
Jerry King

Decree final

Entered in C.B.
No. 8-p-25-

Enter this decree
May 16 1905.
J. A. W. Sten

To Jerry King:

You are hereby notified that on the 22nd day of April, 1905, at the office of L. T. Hyatt, in the town of Jonesville, Lee County, Virginia, I will take the depositions of Rufus Miles, Alfred Goins, May King and others which depositions, when taken, are intended to be read as evidence on my behalf in a certain suit for divorce pending in Lee Circuit court wherein I am plaintiff and you are defendant.

Lula King

By counsel.

L. T. Hyatt counsel.

*Executed by delivering a true copy of the
within notice to Jerry King on the 19 day of April
1905.*

This April 19, 1905

*Mr. D. Denny Deputy for
P. M. Ball, Sheriff of Lee Co. Va.*

Lula King
vs { Lu Chu
Jerry King

Notice to take deposition

BY COMMISSIONER

Be read as evidence on my behalf in a certain suit for damages brought by King and others which depositions, when taken, are intended to vindicate, I will take the depositions of Mrs. King, Alice King, at the office of L. T. Myers, Jr. in the town of Jonesville, Lee County, you are hereby notified that on the 22nd day of April, 1902, to Jerry King:

The depositions of Rufus Miles and others taken, before me Geo.P.Gridlin, a Commissioner in Chancery for the Circuit Court of Lee County, Virginia, at the office of L.T.Hyatt, in the town of Jonesville, Va., on the 22nd day of April, 1905, pursuant to notice hereto attached, which depositions are intended to be read as evidence in behalf of the plaintiff in a certain suit in chancery now depending in the Circuit Court of Lee County, in which Lula King is plaintiff and Jerry King is defendant.

Present L.T.Hyatt, attorney for plaintiff.

Rufus Miles a witness of lawful age being duly sworn deposes as follows:

Q.1.-- Please state your age, residence and occupation.

A.-- Am 21 years old, live near Jonesville, am now mining.

Q.2.-- Do you know Lula King, the wife of Jerry King and also the said Jerry.

A.-- I am acquainted with both of said parties.

Q.3.-- About how long if you know, have they been married?

A.-- About 3 years.

Q.4.-- How long has it been since they lived together?

A.-- I don't know that they ever lived together. I understood that they lived together a little while at Pennington Gap something over a year ago.

Q.5.-- Do you know Mat Williams?

A.-- Yes sir.

Q.6.-- Did you ever see Jerry King guilty of any improper conduct with Mat Williams, and if so when, and state what it was?

A.-- I have seen him hugging around her, and seen him take her out in to the bushes. I saw him go out in the bushes one night and stay something like an hour or hour and a half. I have seen her sitting on his lap lots of times. These acts have occurred within the last year, or at least since he moved back here from Pennington Gap. It has been about a month ago since the time I saw him take her out into the bushes that night. I do not remember the exact time.

Q.7.-- Did anybody go with them when they went off in the bushes

together?

A.-- Nobody else that I saw.

Q.8.-- What is the reputation of Mat Williams in the community where she lives for chastity and virtue, and what is the reputation of the house where she lives, and where the defendant visited her?

A.-- She has the reputation of being a woman of bad character for chastity, and the house where she lives and where I saw the defendant visiting her has the reputation of being a house of ill-fame.

Q.9.-- Where do Jerry King and Lula King now live, and where have they lived for the last two years.

A!-- Jerry King has lived in the County all his life I suppose, at least he has lived here every since I have know for ten or fifteen years. I know that Lula King has lived here in the County for four or five years.

Q.10.-- Did you ever see Jerry King guilty of any improper conduct with any other women?

A.-- I have seen him with Mert Collins, hugging around her and going places with her. Mert Collins is a notorious strumpet.

Q.11.-- How long has it been since Lula King has lived with Jerry as his wife.

A.-- It has been about a year.
And further deponet saith not.

Rufus X Miles
Mark

Franee Miles another witness of lawful age being duly sworn deposes as follows:

Q.1.-- Please state your age, residence and occupation.

A.-- I am 58 years old, live near Jonesville, and am a farmer.

Q.2-- Did you recently live on Town Branch near where Mat Williams lives?

A.-- Yes sir.

Q.3.-- What is her reputation for chastity?

A.-- She has the reputation of being a notorious prostitute.

Q.4.-- Did you ever see Jerry King guilty of any improper conduct with Mat Williams, if so what ?

A.-- I have. I have seen him hugged up with her, and they were blackguarding and cursing, on several occasions. I have not seen much of them since I moved some two months ago.

Q.5.-- Did you ever see Jerry King associating with Mert Collins?

A.-- I have seen him going there after dark and coming away about daylight next morning.

Q.6.-- What is her reputation for chastity?

A.-- It is just as bad as it can be.

Q.7.-- Has Lula ever lived Jerry King since you have seen these acts of his?

A.-- She has not.

And further deponent saith not.

with claims 1 day 50 c

g
- *Frances Miles*

Virginia, Lee County, to-wit,

I, Geo.P.Gridlin, a Commissioner in Chancery for the Circuit Court of Lee County, Virginia do certify that the foregoing depositions of Rufus Miles and France Miles were taken sworn to and subscribed before me at the time, place and for the purpose in the caption mentioned.

Given under my hand this the 22nd day of April, 1905.

Geo P Gridlin Comr. in Chy.

Lula King
vs. { Dan Clay

Jerry King

Depos.

Rufus Mills

Fauce Mills

Cour. du

Cost

50

75

Prize \$25

Filed Apr 24, 1905

H. H. Lang

Depositor not paid

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Commonwealth of Virginia

To the Sheriff of Lee County, Greeting:

You are hereby commanded to summon Rufus Miles, Billy
Carroll, Alfred Goins May King, to appear before me,
Geo. P. Cridlin a Commissioner in Chancery for the Circuit Court of
at my office in the town of Jonesville, on the 22nd day of April, 1905
Lee County, Virginia, to testify and give their depositions on
behalf of Lula King, in a certain matter of controversy on the
chancery side of our said Court depending and undetermined, be-
tween the said Lula King, plaintiff and Jerry King Defendant.
And this they shall in no wise omit. And have then there this writ.

Given under my hand this the 19th day of April, 1905.

Geo. P. Cridlin
Comr. in Chancery.

Executed by summon-
ing the within named
May King, Rufus Miles
and Billy Carroll.

Apr 20 1905.

Wm. D. Henry W. S.

The Commonwealth of Virginia,

To the Sheriff of the County of Lee, Greeting:

WE COMMAND YOU, That you summon

Jerry King

to appear at the Clerk's office of the Circuit Court of the County of Lee, at rules to be held for the said court, on the *1st* Monday in *May*, 190*5*, to answer a bill in chancery exhibited against *him*

in our said Court by Lula King.

And have then there this writ. Witness, H. C. T. EWING, Clerk of our said Court, at the court-house, the *19th*

day of *April*, 190*5*, and the *29th* year of the Commonwealth.

A Copy, Teste:

H. C. T. Ewing, Clerk.

_____, Clerk.

Lula King

VS

SUBPOENA
IN
CHANCERY.

Jerry King

L. R. H. Gatt. p. q

To

1st May
Lee Circuit.

Rules.

Court.

Executed by delivering an office copy of
the within copy to Jerry King on the
19th day of April, 1905.
This April 29, 1905

M. D. Denny Deputy for
P. M. Ball Sheriff of Lee Co. Va.